

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: <u>siting.council@ct.gov</u>
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

July 29, 2021

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 kbaldwin@rc.com

RE: **DOCKET NO. 502-** Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 118 Newton Road, Woodbridge, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than August 17, 2021.

Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the August 17, 2021 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

s/Melanie Bachman

Melanie Bachman Executive Director

c: Service List dated July 14, 2021

MB/RM

Docket No. 502 Pre-Hearing Interrogatories to Applicant - Set 2

July 29, 2021

- 38. Can a tower access drive be developed using the existing driveway that extends from Newton Road?
- 39. Referring to the Site Search Summary in Application Attachment 8, the distances provided from the identified site locations to the proposed site do not appear correct. Revise the summary to include correct information, if applicable. For the sites that were rejected based on distance, would any of these locations be considered viable if the revised distances were closer to the proposed site?
- 40. Was the Woodbridge Land Trust contacted to determine if the Trust was willing to lease space for a tower facility on any of their parcels? If so, who was contacted and when? Identify which parcels were offered to Cellco, if any.
- 41. Referring to the Cellco's response to Council Interrogatory 10, the coverage plot for a 180-foot tower at 46 Burnt Swamp Road appears comparable to that of coverage provided by the proposed site. Would a 180-foot tower at this location provide adequate coverage to the proposed service area? If not, what specific areas would not have adequate service?
- 42. If a 180-foot tower at 46 Burnt Swamp Road provides adequate coverage to the proposed service area, would Cellco pursue a land lease with the Town for an alternative tower location?
- 43. Using tower photo-simulations already submitted in the application, provide photo-simulations of a faux tree tower at the proposed site from representative locations in the surrounding area.